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Via ECF

June 15, 2023

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570 (GBD)
(SN); *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*,
04-cv-1076 (GBD)(SN)

Dear Judge Netburn:

Today we filed a revised motion for final judgments as to liability and for partial final damages judgments against the Taliban for a subset of the *O'Neill* Plaintiffs who were not U.S. Nationals on September 11, 2001. ECF No. 9130.

We respectfully request that the Court consider this motion in lieu of the motion presently pending at ECF No. 8589. The present motion includes additional information and legal analysis based on guidance provided by the Court's recent ruling denying a judgment motion against the Taliban without prejudice for another group of non-citizen plaintiffs in a related case. *See* ECF Nos. 8929, 8973.

We have reviewed our pending judgment motion against the Islamic Republic of Iran filed on behalf of a subset of the *O'Neill* Plaintiffs who were not U.S. Nationals on September 11, 2001, ECF No. 8631, in light of the Court's rulings at ECF Nos. 8929 and 8973, and believe that it does not need to be revised and refiled in light of the Court's requirements.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry Goldman

Jerry S. Goldman, Esq.

Attorney for the Plaintiffs

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Cc (via ECF): The Honorable George B. Daniels
All MDL Counsels of Record